

From: [Suplee, Mike](#)
To: [Greeley, Carrie](#)
Subject: FW: Public comment on the Board of Environmental Review (Board) is proposed numeric standards for nitrogen and phosphorus concentrations in surface waters.
Date: Friday, April 04, 2014 3:39:04 PM

Hi Carrie;

Below is Jon Cuthbertson's comment

From: Johnson, Elois
Sent: Friday, March 28, 2014 10:17 AM
To: Orr, Katherine; Suplee, Mike
Subject: FW: Public comment on the Board of Environmental Review (Board) is proposed numeric standards for nitrogen and phosphorus concentrations in surface waters.

Elois M. Johnson
Paralegal
Department of Environmental Quality
PO Box 200901
Helena, MT 59620-0901
Telephone: 406.444.2630
Fax: 406.444.4386
Email: ejohnson@mt.gov

From: M.E. Lab [<mailto:info@melab.us>]
Sent: Friday, March 28, 2014 10:10 AM
To: Johnson, Elois; Greeley, Carrie; wpippin@energylab.com
Subject: Public comment on the Board of Environmental Review (Board) is proposed numeric standards for nitrogen and phosphorus concentrations in surface waters.

Elois Johnson,

In Circular DEQ 12 on page 5 you list an RRV for total kjeldahl nitrogen of 0.15 mg/L or 150 ug/L.

This is unobtainable using that method.

A normal RRV for total kjeldahl nitrogen is 0.5 mg/L.

A really good lab, under perfect conditions MAY be able to achieve 0.2 mg/L.

If you doubt me, call the various labs in Montana and ask them.

Even your own State DPPHS lab cannot achieve that RRV.

There is too much cross contamination between the tubes.

Passing a rule that requires using a 40 year old method, and then requiring an unrealistic RRV is wrong.

You are just building in a problem.

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Don't do it.

Sincerely,

Jon Cuthbertson
Laboratory Director
Montana Environmental Laboratory LLC.